



LMF: USAO 2012R00179

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2012 MAR 19 P 2:48

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**DENNIS SMITH,
a/k/a "Domo,"**

Defendant

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CRIMINAL NO.

CLERK'S OFFICE
AT GREENBELT

DKC 12 CR 0149

**(Sex Trafficking, 18 U.S.C. § 1591(a);
Transporting a Minor to Engage in
Prostitution, 18 U.S.C. § 2423(a);
Forfeiture, 18 U.S.C. § 1594(e),
18 U.S.C. § 2428)**

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Between on or about October 23, 2011 and on or about October 27, 2011, in the District
of Maryland and elsewhere, the defendant,

**DENNIS SMITH,
a/k/a/ "Domo,"**

did knowingly transport an individual, M.C., who had not attained the age of 18 years in interstate
and foreign commerce, with the intent that the individual engage in prostitution.

18 U.S.C. § 2423(a)

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

Between on or about February 29, 2012 and on or about March 6, 2012, in the District of Maryland and elsewhere, the defendant,

**DENNIS SMITH,
a/k/a/ "Domo,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, K.E., a 15 year old female, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause K.E. to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe K.E., that K.E. had not attained the age of 18 years and would be caused to engage in a commercial sex act.

18 U.S.C. § 1591(a)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Sections 2428(a) and (b) and 1594(e)(1) and (2), in the event of the defendant's conviction on Counts One and Two of this Indictment.

2. As a result of the offense set forth in Count One of this Indictment, the defendant,

**DENNIS SMITH,
a/k/a/ "Domo,"**

shall forfeit to the United States of America:

a. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

b. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

2. As a result of the offense set forth in Count One of this Indictment, the defendant,

**DENNIS SMITH,
a/k/a/ "Domo,"**

shall forfeit to the United States of America:

a. The defendant's interest in any property, real or personal, that was used or intended to be used to commit or facilitate the commission of the offense; and .

b. Any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

3. As a result of the offense set forth in Count Two of this Indictment, the defendant,

**DENNIS SMITH,
a/k/a/ "Domo,"**

shall forfeit to the United States of America:

a. Any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and

b. Any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

4. If any of the property described above as being subject to forfeiture pursuant to 18 U.S.C. §§ 2428(a) and (b) and 18 U.S.C. §§ 1594(e)(1) and (2), as a result of any act or omission of the defendant,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

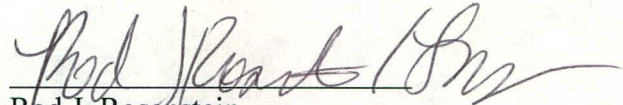
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be subdivided without difficulty;

the United States intends to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

18 U.S.C. § 2428
18 U.S.C. § 1594(e)



Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

March 19 2012

Date